

GM Assembly Division

General Motors Corporation

Leeds Plant

6817 Stadium Drive
Kansas City, Missouri 64129

March 30, 1982

Mr. David Doyle
Air and Waste Compliance Branch
U.S. EPA
324 East 11th Street
Kansas City, Missouri 64106

Subject: Response to EPA letter of March 1, 1982 on alleged
deficiencies found in EPA inspection of the GMAD
Leeds Plant on November 17, 1981

Dear Sir:

Our response to your letter of March 1, 1982 is as follows:

1. "The facility's waste manifests did not include the generators transporters or designated facility's EPA identification number."

Response: We have reviewed our Missouri manifest records for shipments of hazardous wastes and have found the following:

The Missouri manifest does not provide a designated space to contain the EPA identification numbers mentioned. The identification numbers provided by the State for generators, transporters, and facilities were completed as required.

We have instructed our personnel and supervisors to include the EPA I.D. numbers for the generator, transporter, and designated facility on future manifests, as indicated on the attached Missouri manifest.

2. "At the time of inspection, a complete facility operating record did not exist."

Response: The operating record procedure for the GMAD Leeds Plant was written and in place at the time of the inspection. However, the operating records were misplaced and therefore could not be produced at the time of the inspection.

We have since reviewed this requirement with our personnel. A copy of the operating record is being maintained by the supervisor in charge of the facility.



R00158023
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AIR AND HAZARDOUS MATERIALS
DIVISION

3. "Containers containing ignitable hazardous wastes were being stored at a distance less than 15 meters from the facility property line."

Response: The containers that were within 15 meters of the property line fence were removed to a disposal facility immediately after the inspection.

At the time of the inspection we advised the inspectors that the drums in question were being marshalled in that area in preparation for final marking identification prior to shipment.

We have instructed our personnel not to use the area within 15 meters of the property line fence for future shipment preparation.

4. "The inspection of the drum storage area revealed that several bung type drums were not sealed properly."

Response: This alleged deficiency was not mentioned to Leeds personnel at the time of the inspection. Since receiving notification, we have examined the storage area for the condition described. At the time of our review, we were unable to find any drums that were not properly sealed.

We have reviewed this condition with our personnel, and have cautioned them to check each drum for proper seal as it is stored.

Please note that the EPA identification number for the Leeds Plant as shown on your March 1 letter is incorrect. The correct identification number for the Leeds Plant is MOD 000 822668.

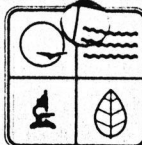
If you should need additional information in this matter, please contact Larry Pemberton of my staff at 281-7388.



J.E. Daniels
Director- Plant Engineering

JED/hh

314-751-3241



MANIFEST DOCUMENT NUMBER

01486	009	103
Generator I.D. No.	Waste I.D. No.	Shipment No.

MOD 000 822 668

† 1 to be completed by the generator (Instructions for completing and handling this document are on the reverse side)

me	Identification	Address	Telephone No.	Date Shipped or Re
m 1. Generator MOD 000 822 668 Y. M. Day, Inc. - Leeds Plant	Generator I.D. No. 01486	6817 Stadium Dr. Kansas City, Mo. 64129	913-281-7478	3-17-82
m 2. Transporter Solvent Recovery Corp. - MOD 000 610 766	Transporter No. 11-1091	716 Mulberry Kansas City, Mo. 64101	816-474-1391	3-17-82
m 3. Treatment, Storage or Disposal Facility Solvent Recovery Corp. - MOD 000 610 766	T, S, D, Facility Permit No. RR-19	716 Mulberry Kansas City, Mo. 64101	816-474-1391	3-17-82
m 4. Waste Paint - UN 1263	DOT Hazard Class Flammable Liquid	DOT Label Required or Exceptions Flammable Liquid	Quantity 36 Drums	Units* 1 2 3 4 5 5

*Circle one: 1. tons; 2. gallons; 3. cubic yds; 4 drums - 55 gallon; or 5. Pounds

m 5. Immediate Emergency Response Information Eliminate source of ignition, recover material with absorbent, avoid prolonged inhalation of vapor. In the event of a spill, contact the National Response Center, U. S. Coast Guard, 800-424-8802 SPECIAL HANDLING INSTRUCTIONS Eliminate source of ignition	24-hour emergency telephone numbers Plant Security 913-281-7440 Chemtrec 800-424-9300
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Item 6.

Placards Provided or Affixed Flammable	
Shipper's Check List	
DOT Labels Applied and Secure	DOT Cont
Proper DOT Name on all Packages	Checked for Proper Sealing
Air Cargo Only	Peligro Label Applied

m 7. GENERATOR CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the Missouri Department of Natural Resources.

Generator's Signature St. Woods Date 3-17-82

† 2

to be completed by the transporter

m 8. TRANSPORTER CERTIFICATION. This is to certify acceptance of the hazardous waste shipment. Date accepted for Shipment:

Transporter's Signature Miller Langdon Date 3-17-82

† 3

m 9. TSD/CERTIFICATION. This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

DF Signature Miller Langdon Date 3-17-82

SOLVENT RECOVERY CORP.

MAR 17 1982

THIS SHIPMENT RECEIVED SUBJECT
TO APPROVAL WHEN OPENED

By Miller Langdon
Department Final Copy